

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CAREPOINT HEALTH
MANAGEMENT ASSOCIATES LLC,
HUDSON HOSPITAL OPCO LLC
d/b/a CAREPOINT HEALTH –
CHRIST HOSPITAL, IJGK, LLC,
IJGK PROPCO LLC and IJGK OPCO
LLC d/b/a CAREPOINT HEALTH –
BAYONNE MEDICAL CENTER, and
HUMC OPCO LLC d/b/a CAREPOINT
HEALTH – HOBOKEN UNIVERSITY
MEDICAL CENTER

Plaintiffs,

v.

RWJ BARNABAS HEALTH, INC.

Defendant.

Hon. Evelyn Padin, U.S.D.J

Hon. Cathy L. Waldor, U.S.M.J.

Civil Action No.

2:22-cv-05421-EP-CLW

**NOTICE OF MOTION FOR
LEAVE TO FILE SECOND
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that on January 17, 2023, at 9:00 A.M., or as soon thereafter as counsel may be heard, Plaintiffs, by and through their undersigned counsel, shall move before the Honorable Evelyn Padin, U.S.D.J., at the United States Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for entry of an Order granting Plaintiffs' Motion for Leave to Amend.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiffs rely upon their Motion, any additional submissions made, and oral argument (if any). A proposed form of Order is also submitted.

Dated: December 22, 2022

Respectfully submitted,

/s/ Patrick M. Harrington

Patrick M. Harrington, Esquire
Dilworth Paxson LLP
457 Haddonfield Road, Suite 700
Cherry Hill, NJ 08002
pharrington@dilworthlaw.com
Telephone: (856) 675-1900
Facsimile: (856) 663-8855
– and –

James J. Rodgers, Esquire*
Dilworth Paxson LLP
1500 Market St., Suite 3500E
Philadelphia, PA 19102
jrodgers@dilworthlaw.com
Telephone: (215) 575-7100
Facsimile: (215) 764-4603
*Admitted Pro Hac Vice

Attorneys for Plaintiffs